

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Office of the Director  
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April 26, 2018

## **SENT VIA EMAIL ONLY**

Mr. John Filippelli  
Director, Clean Air and Sustainability Division  
U.S. Environmental Protection Agency, Region 2  
290 Broadway, 25th Floor  
New York, New York 10007-1866

Re: RCRA Subtitle C Grant No. D-96292417  
Final Progress Report

Dear Mr. Filippelli:

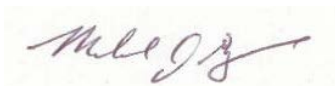
Enclosed is the Final Progress Report for the New York State RCRA Subtitle C Hazardous Waste Management Grant for the period April 1, 2017 to March 31, 2018.

The report summarizes the RCRA-C work accomplished during this reporting period that relates to the approved New York State Department of Environmental Conservation (Department) work plan.

The Department will continue to work closely with the United States Environmental Protection Agency to improve the implementation of the RCRA-C Program in New York State.

As has been discussed, the Division of Environmental Remediation has reorganized and the Department's Division of Material Management has assumed responsibility for many of the RCRA Program obligations. We look forward to our meeting on May 22nd to discuss this transition further.

Sincerely,



Michael J. Ryan, P.E.  
Director  
Division of Environmental Remediation

Enclosure

Ec w/ Enc:

- D. LaPosta, USEPA ([laposta.dore@epa.gov](mailto:laposta.dore@epa.gov))
- J. Filippelli, USEPA ([filippelli.john@epa.gov](mailto:filippelli.john@epa.gov))
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- D. Vitale, NYSDEC DMM

Division of Environmental Remediation (DER)  
New York State Department of Environmental Conservation (DEC)  
Albany, New York 12233-7011  
RCRA Subtitle "C" Grant Report

**Final Progress Report**  
**April 1, 2017 to March 31, 2018**

**I. Better Waste Management and Restoration of Contaminated Sites**

**A. NYCRR Part 373 Permit Activities (Including New Capacity Permits)**

**Status of Outputs to Date:**

See Attachment 1 – RCRA Permit-Order Projects

This report provides notable permit milestones including Completeness Review, Public Notice, Hearing, Permit Issuance/Denial, RCRA Closure for pending new permits or renewals. It also reports on Consent Orders executed in lieu of permits.

One consent order was executed in lieu of a corrective action permit – Ashland Distribution.

See Attachment 5 – Operating, Post Closure, and Corrective Action Permit Universe

This report provides the status of all permits including Operating, Post Closure, and Corrective Action Permits.

**B. Corrective Action**

**Status of Outputs to Date:**

See Attachment 3 – RCRA Corrective Action Remedial Project Tracking

In the SFY 17/18 Work Plan, DER provided projections of RCRA Corrective Action Remedial Projects (CA610, CA550, CA650) based on the universe we are tracking. This report provides the actual completions.

See Attachment 4 – RCRA Site-wide Reporting

In the SFY 17/18 Work Plan, DER provided projections of potential Environmental Indicators (CA400, CA550, CA725, CA750, CA800 and CA999) based on the universe we are tracking. This report provides the actual completions.

**C. Quality Assurance Program**

**Status of Outputs to Date:**

1. Continued implementation of the EPA approved QA Program. Consistent with the DER QMP field data submitted to DER, that has corresponding data quality objectives, is accompanied by a Data Usability Summary Report (DUSR) and reviewed by Project Managers with assistance from DER chemists as needed. An accounting of the quality assurance projects completed during this reporting period is provided below:

Type	Reporting Period 4/1 – 9/30	Reporting Period 10/1 – 3/31	Totals 4/1 – 3/31
QAPP	2	1	3
Data Review	3	4	7
Technical Support	7	21	28
Lab SOP Review	0		0
WAP Review	1	1	2

#### **D. State Program Development**

##### **Status of Outputs to Date:**

##### **1. RCRA-C Regulations**

DER is revising State hazardous waste management regulations to continue to be at least as stringent as the federal RCRA-C regulations. A package of updates to state regulations, referred to as Fedreg5 and has been prepared for formal proposal, and is currently being reviewed by the state Division of Budget. This package addresses regulatory changes from 38 federal registers and approximately 80 state initiatives. The June 2014 Cathode Ray Tube Export rule is also included in this rulemaking. During 2017-2018, DEC continued work on a regulatory update which addresses major regulatory changes that EPA has published since 2012. This package, referred to as FedReg6, includes the Solvent-Contaminated Wipes Rule; the Carbon Dioxide Sequestration Rule; the Electronic Manifest Rule; the 2008 Definition of Solid Waste Rule, as amended in January 2015, as amended in December 2014, the 2016 Hazardous Waste Export-Import Rule Revisions, and the 2016 Hazardous Waste Generator Improvements Rule. Fedreg6 also includes conforming changes to the State's Used Oil Management regulations.

##### **2. Used Oil Regulations:**

Conforming changes were made to the used oil regulations as part of a revision to the State's solid waste regulations. The revisions were published on September 5, 2017 and became effective on November 4, 2017.

##### **Status of Outputs to Date:**

DER will respond to any questions EPA may have during the codification process of these regulations. Fedreg6, which is in preliminary public review, includes additional conforming changes to the State's Used Oil Management regulations.

#### **E. Expanded Public Involvement Activities**

##### **Status of Outputs to Date:**

1. DEC continued to update and expand the DER website to include additional information and guidance relative to the RCRA program. On March 15, 2018 the Department announced the launch of DECinfo Locator, DEC's latest initiative to improve public access to important

information and increase trust in our state government through transparency. DER staff were involved in the production of this tool. The link to this information may be found at: <http://www.dec.ny.gov/pubs/109457.html> DECinfo Locator is an agency-wide project that has been in development since the beginning of 2017. It is a map-based web tool to provide easy access to documents and public data pertaining to the environmental quality of specific sites and outdoor recreational opportunities in NYS. The current prototype includes information on Air Title 5 permitted facilities, wastewater treatment facilities, remediation and bulk storage sites, permitted mines, boat launches, DEC state land, and much more. The project will ultimately include other program information. This new map-based web application will promote openness in government and public trust. The same website can also be used by DEC staff to collaborate and work more effectively together.

2. There were no public information meetings regarding remedy selection held during this reporting period. A public meeting was held in March 2018 regarding selection of the remedy for the IBM-Endicott site related to operable unit 7.

#### **F. Strategic Plan**

##### **Status of Outputs to Date:**

1. In accordance with DER-31, Green Remediation, standard green remediation elements are included in Statements of Basis for Corrective Action. We are expanding the implementation of DER-31 to our regulation of RCRA corrective actions for RCRA sites under DEC's authority.
2. Updated Permit Renewal reports are provided in Attachment 5.
3. DER has developed, and continues to maintain, several planning reports in the DER internal database, the Unified Information System (UIS), for the RCRA-C program. Permit renewals are tracked in both RCRAInfo and UIS. DER and EPA staff participated in conference calls and meetings relative to progress on the Environmental Indicator (EI) Determination outputs for the 2020 GPRA CA baseline facilities. Frequent review and evaluation of the status of GPRA facilities occurred during the period to refine the EI projections and review current information.

#### **G. IT Integration**

##### **Status of Outputs to Date:**

1. Continued to upgrade the DER Unified Information System (UIS) to facilitate day-to-day management of GPRA and Non-GPRA RCRA sites. UIS is a custom-built database used by DER for the management of its program data. This includes data related to RCRA projects; Inactive Hazardous Waste Disposal Site projects; Brownfield projects; chemical and petroleum spill reporting; chemical and petroleum bulk storage registration; and others. As part of this effort, all existing reports were converted to an updated version of Crystal reports and server reporting software. A majority of the RCRA tracking reports were reviewed, updated and converted as part of this upgrade during this grant period.

DER and the New York State Office of Information Technology Services (OITS) have upgraded all servers to virtual servers and supported operating systems and database software. Upon completion of the upgrades, DER is beginning to develop data need requirements for integrating other RCRA program related data (e.g., Large Quantity Generators) into the UIS.

2. The programming behind the Groundwater Inspection Report (Attachment 2) was changed by OITS to prepopulate planned ends for CME/OM inspections and generate future projects on a recurring cycle to track DER's groundwater inspection obligations based on the scheduling required by guidance. The attached report shows Groundwater inspections needed in the 2018/2019 fiscal year. This report will be used as an attachment to the RCRA grant and semi-annual reporting in future reports. DER has developed guidance for CME and O&M inspections which is posted on the internal site. DER continues to be available to work with EPA Region 2 to evaluate available technology and the use of EPA Exchange Network's XML interface for tablet use. DEC is seeking to participate in an initiative with the Environmental Council of States (ECOS) and EPA called "E-Enterprise for the Environment," to develop a mobile field inspection tool.
3. DER continues to maintain the legacy document management system (eDocs) for documents not migrated into DER's current document management system DECDocs. DER implemented DECDocs in 2014, and continues to work with OITS to refine the application. The current design for site-related documents requires that a site have a UIS Program Type and ID number to incorporate them into the system. Since RCRA sites have been added to the UIS, DER has tried to include newer RCRA documents (documents created since 2010) into DECDocs using the site-related design concept making them more accessible internally. DER continues to evaluate the need to incorporate documents created prior to 2010 with newer site related documents into DECDocs.
4. DER continues to leverage available software to maximize the electronic submission, distribution and storage of documents related to the RCRA-C program. This includes using email to the greatest extent possible.
5. DER continues to participate in the national effort to implement electronic manifesting. DER keeps EPA Region 2 informed of any formal correspondence between DEC and the eManifest Workgroup.
6. The Department continued to participate on the eManifest Design Team.

## II. Credible Deterrent to Pollution and Greater Compliance with the Law

### A. Compliance Inspections

#### Status of Outputs to Date:

##### 1. Inspections

Types of Inspections	Full Year Commitment	4/1-9/30 Actual	10/1-3/31 Actual	Totals
Land Disposal Facilities <sup>5</sup>	3	4	4	8
Commercial Facilities <sup>1,2</sup>	11	9	12	21
Boiler/Furnace (BIF) <sup>1,2</sup>	1	0	1	1
Incinerators <sup>1, 2</sup>	3	0	2	2
Other TSDFs	7	2	5	7
Large Quantity Generators (LQG) <sup>3, 4</sup>	160	103	83	186
Other Generators/Non-Notifiers <sup>3</sup>	297	235	213	448
<b>TOTAL</b>	<b>482</b>	<b>353</b>	<b>320</b>	<b>673</b>

#### Footnotes:

(1) This class must be inspected every year. BIF inspections will be performed by DEC's Division of Air Resources under the Title V program going forward.

(2) The incinerator inspections will be performed by the DEC's Division of Air Resources under the Title V program going forward.

(3) Generator inspections include exempt, ten-day transporter facilities.

(4) This number is a goal, not a fixed commitment. This number is derived from Annual Reports for 2013, 2014, 2015 along with 2016 manifest data showing a 2-year alternate LQG universe of 801 facilities that filed annual reports in 2015 and shipped more than 0.1 tons of waste in 2016 or, filed at least one annual report and shipped more than 6.6 tons of waste in 2016. The inspection commitment is based upon inspecting LQGs. When targeting LQGs, DEC will take into consideration policy guidelines for inspecting all LQGs within a 5-year period. Generator status may change month-to-month. Shortfalls on LQG inspections will be made up with other generator inspections in accordance with EPA's Compliance Monitoring Strategy.

(5) In the Annual Work Plan, total LDF full year commitment was 10 and total Other TSDF full year commitment was 0. This was in error. Intent was to have LDF commitment of 3 and Other LDF commitment of 7. Total sum of 10 remains unchanged.

##### 2. Groundwater Inspections: See Attachment 2 – RCRA Groundwater Inspection Reporting Please note that there are no projects to report for this period.

## **B. Enforcement**

Status of Outputs to Date:

<b>ENFORCEMENT OUTPUT GOALS</b>				
<b>Type of Action</b>	<b>Commitment</b>	<b>4/1-9/30 Actual</b>	<b>10/1-3/31 Actual</b>	<b>4/1-3/31 Actual</b>
Warning Letters	225	142	122	264
Orders/Initial Actions	30	41	26	67
<b>TOTAL</b>	255	183	148	331

## **C. Staff Development/Training**

Status of Outputs to Date:

1. DER continued a cross-training program to provide greater flexibility and efficiencies so that other DER inspectors (bulk storage) can inspect specific types of RCRA facilities (e.g., certain large/small quantity generators). Staff assigned to complete RCRA inspections at any facility are provided the necessary training, and are certified as appropriate. EPA reserves, and continues to have, the right to conduct oversight inspections. Two new RCRA-C inspectors were certified this period.
2. Records of training activities are maintained and available to EPA Region 2 on request.
3. DER maintains an effective RCRA-C inspector-training program and maintains a list of all certified inspectors.
4. EPA Region 2 will assist DEC in scheduling appropriate courses, as necessary, when changes are made in EPA/DEC regulations and policies.
5. DER continued the use of specialized RCRA Inspector training materials and tools. These materials allow DEC to continue to increase the overall timeliness, consistency, and completeness of all RCRA inspections.
6. DER continues to update and post guidance and resources for RCRA inspectors on the DER internal website and to add topic-specific guidance on emerging issues.

## **D. Technical Assistance**

Status of Outputs to Date:

Responded to written and verbal requests for interpretations and determinations of the State's hazardous waste regulations. DER responded to approximately 420 inquiries and prepared approximately 52 written responses.



## Pharmacy Sector Compliance Assistance and Auditing Initiative

As discussed with EPA Region 2, DEC has initiated a compliance assistance and auditing program to address system compliance issues at pharmacies. This initiative was announced in January 2017. The initial deadline has passed and more than 400 applicants have signed up covering more than a thousand facilities. This initiative will be completed in December 2018, and DEC plans to resume inspection of participating facilities in 2019.

### **E. Maintain Manifest System**

#### Status of Outputs to Date:

Processed manifests received through a computerized tracking system (eSMART), resolved discrepancies, obtained manifests from receiving facilities to document receipt of shipment, assured all manifests received from small quantity and large quantity generators had EPA Identification numbers. Referred parties in non-compliance for appropriate enforcement action. Maintained a public website to disseminate general information and for training purposes.

Participated in the national effort to implement electronic manifesting including providing comments on the EPA's eManifest User Fee Proposed Rule. DEC continues to work with Consolidated Edison (Con Ed) to implement a workable solution to reduce the number of RCRA-C Provisional Identification numbers required by Con Ed and issued by EPA Region 2. DEC and Con Ed are currently negotiating the contents of an administrative consent order to resolve the issue.

### **F. Small Quantity Generator (SQG) Program**

#### Status of Outputs to Date:

The activities carried out included:

- received and responded to inquiries via phone, email, and letters;
- maintained the SQG hotline and email account; and
- provided responses to approximately 50 requests for assistance per month from the regulated community.

### **G. Compliance Analysis and Inspection Targeting**

#### Status of Outputs to Date:

Work has continued to ensure that long term LQGs are identified and targeted for inspection, to meet our goal of inspecting LQGs in Alternate LQG universe once every five years. Lists of new notifies, and sites doing on-site HW treatment without a permit (which filed a 2015 annual HW report) were included in targeting.

## H. Financial Assurance (FA)

### Status of Outputs to Date

1. **Financial Assurance (FA) instrument review:** FA instruments received by DEC during this reporting period were reviewed and discrepancies were resolved by FA staff. These reviews included (a) updates to existing FA instruments where FA staff verifies that prior cost estimates have been adjusted annually using the appropriate inflation factor, or cost estimates are recalculated in current dollars; and (b) issuance of new instruments since the facility owners/operators continue to change financial institutions or submit different instruments to replace their existing ones. See item 1 below under 'Other FA Activities' for details regarding release letters.

FA staff verified that the language in each instrument is written as prescribed at 6 NYCRR 373-2.8. FA staff consulted with the respective DEC project manager of the RCRA-C facility to discuss FA obligations that have been submitted. FA staff also confirmed that the cost estimates provided were acceptable and consistent with FA requirements in the Part 373 permit or DEC consent order, and discussed with the permit writer as needed. If there were discrepancies with either the FA instrument language or obligations, then FA staff contacted the facility owner/operator to address the situation. When necessary, EPA Region 2 (EPA-R2) was consulted to obtain guidance and direction on appropriate responses.

2. **RCRAInfo FA Module:** Dozens of FA cost estimate and mechanism records were added to the FA module of the RCRAInfo tracking system by FA staff during the reporting period. On February 9, 2017, EPA-HQ generated and distributed a list of facilities to all states for various FA obligations that have expired FA instruments or missing cost estimates in RCRAInfo with a directive to complete the entries and updates by September 29, 2017. This pertained to the 2015 audit conducted by the U.S. Office of the Inspector General (OIG) which resulted in OIG releasing a management alert on March 31, 2016 that identified significant data quality deficiencies in RCRAInfo for FA records, which could impede EPA's ability to ensure companies can pay for environmental cleanups. It is important to note that the EPA data system was developed primarily for tracking cleanup progress rather than for monitoring FA compliance.

By the required deadline, FA staff addressed the remaining FA data gaps that existed for the 17 facilities in New York. FA staff also made necessary data corrections and entered several new or updated instruments that were received by DEC during this reporting period.

3. **Enforcement referrals:** No referrals for enforcement actions of non-compliance were made by FA staff during this reporting period.
4. **FA conference calls:** FA staff participated in all the EPA-States FA monthly conference calls held during this reporting period, which continue to be coordinated by EPA-HQ. FA staff provided input on the following discussion items:
  - (a) **General Electric (GE) Corporation:** It was determined by EPA-HQ that nationally GE can no longer submit the Financial Test (FT) as an instrument for FA obligations

at their facilities throughout the country. GE submits a FT annually for facilities in New York. See item 3(b) below under 'Other FA Activities' for additional details.

(b) **Trust Agreements:**

**Section 9 - Taxes and Expenses:** This section states that taxes and expenses incurred by the Trustee for administration of the Trust Fund (Fund) and not paid directly by the Settlor, and all charges and disbursements of the Trustee shall be paid from the Fund. The concern with this 'allowance' is that the account balance could be reduced to less than the current cost estimates for the required FA obligation. This reduction would not be available to the beneficiary (i.e., NYSDEC Commissioner) until they receive the annual statement from the Trustee. Per Section 10, Annual Valuation, statements for the Fund are sent annually to the Settlor and beneficiary. It is at that time (which could be almost a year) when the beneficiary would contact the owner/operator to request that the account be increased so the balance is equal to the current cost estimate. Thus, the burden of the making sure the account balance does not fall below the required FA amount is with the beneficiary since the Settlor most likely will not address the situation until they are contacted to do so. Several states send a notice to the owner/operator for the appropriate increase to be made to the Fund within 30 days. States also request account statements monthly or quarterly, instead of only annually (per Section 10).

**Section 13 - Successor Trustee:** This section indicates that the new (successor) Trustee accepts their appointment with same powers and duties as the existing Trustee, but no other documents are needed. However, some Trustees require a letter or subsequent agreement with the Settlor. The beneficiary is not required to sign these 'side' agreements as they are only between the Settlor and Successor Trustee, and not considered amendments. Also, beneficiaries do not sign the initial agreement.

**Section 16 - Amendment of Agreement:** This section states that a Trust Agreement may be amended in writing executed by Settlor, Trustee and beneficiary (Commissioner). Thus, all three signatures are required for an amendment to a Trust Agreement. The NYSDEC Commissioner's designee signs amendments to Trust Agreements.

- (c) **Calculation of Inflation Factor:** EPA recommends that Gross Domestic Product (GDP) be used in place of Gross National Product (GNP) per 1996 EPA policy, although the regulations indicate that GNP should be used. GDP represents products made and services available within the U.S. (and not other countries). Based on EPA's policy, New York has and continues to request that owners/operators of RCRA-C facilities use the Implicit Price Deflator (IPD) for GDP when calculating the inflation factor for the current year. This can be done on a quarterly or annual basis if it is used consistently from year to year.
- (d) **Financial Test (FT) Reviews:** When reviewing the FT, it is important to verify that the required FA obligations were identified appropriately. EPA and states (including New York) have learned during the recent years that owners/operators may only include certain facilities and FA obligations so they pass their FT. Thus, it is possible

that owners/operators are not including all RCRA-C facilities (nationally) that are being covered under the respective FT. See item 3 below under 'Other FA Activities' for specific facilities in New York that did not pass their FT during this reporting period.

- (e) **Letter of Credit (LC) for Third Party Liability (TPL):** JPMorgan Chase Bank submitted a request to amend the language in the LC as prescribed in the DEC regulations to state that the 'maximum liability of the LC shall not exceed an aggregate of \$2M. NYSDEC does not find this acceptable since (1) it does not specify that the aggregate is annual; and (2) it is less stringent than EPA's regulations, which cannot be the case under State Authorization of the RCRA-C program. EPA-HQ, EPA-Regions, and several states provided input and agreed that this proposed language is unacceptable. FA Coordinator contacted the owner/operator (O/O) to inform them that the LC for TPL cannot be amended and in turn they notified JPMorgan Chase Bank. The O/O has obtained a new instrument for TPL coverage in the form of an insurance policy which replaced their LC (and Standby Trust Agreement).
- (f) **Insurance Policies for TPL:** NYSDEC has received insurance policies for TPL with the following scenarios regarding renewal: (1) Policy number is new and it references the previous policy number with the new number being a renewal of such policy; (2) Policy number is same and an endorsement is submitted which states that such policy has an extended policy period of 12 months, and continues to have its policy period extended annually by 12 months **indefinitely** with a new endorsement attached to the initial policy; (3) Policy number is same except for addition of two digits after the policy number, i.e.: PEC0045678-01, where the initial policy issued was PEC0045678. NYSDEC has had several insurance policies renewed this way. It is similar to the previous renewal except that a new policy is issued whereas an endorsement is provided for the other scenario. EPA-HQ, EPA-Regions, and several states indicated that they have also experienced policies renewed in these different ways, depending on the insurance company. As long as the policy is renewed when it needs to be and paid in full with a new endorsement provided annually, then these renewal scenarios are acceptable.

#### Other FA Activities

1. **Release Letters:** New FA instruments were received from facility owners/operators who were replacing current instruments with a new type of instrument or changing financial institutions but keeping the same type of instrument. Thus, DEC issued release letters to the respective financial institutions notifying them that their instrument is returned for termination because the owner/operator had submitted an alternative, acceptable FA. FA staff spent a significant amount of time on this activity during the reporting period since it involves the review of FA instruments, follow up with respective owners/operators, and obtaining approval of the release letter (and signature by Division Director) prior to mailing.
2. **Non-Renewal Notices:** DEC received Notices of Non-Renewal (Notice) from financial institutions when they were not going to renew a letter of credit under the evergreen clause written into this instrument. If FA was still required, FA staff contacted the owner/operator of the respective facility to inform them that an alternate instrument had to be submitted to

DEC before the existing one expired so the owner/operator would not be in non-compliance with their FA requirements. The reason for the issuance of these Notices was that the owner/operator was replacing their instrument and thus the letter of credit did not need to be renewed and would be terminated once DEC received the alternate FA instrument.

3. **Financial Test (FT):** During this reporting period, DEC received notification from the following owners/operators that they did not pass the FTs with financial statements dated December 31, 2016 and thus they could not use FT as the FA instrument for their annual update.

(a) **Alcoa Corporation and Arconic Inc:** Based on a restructuring of Alcoa Inc on November 1, 2016, Alcoa Inc was renamed Arconic Inc (Arconic) and the spin-off company is called Alcoa Corporation (Alcoa), which Reynolds Metals Company, LLC is a subsidiary. Both Alcoa and Arconic did not pass the FT using financial statements dated December 31, 2016. Thus, **Alcoa** (on behalf of its subsidiary Reynolds Metals Company, LLC) and **Arconic** submitted separate Letters of Credit and Standby Trust Agreements (STA) to DEC for their FA obligations to be in compliance with 6 NYCRR 373-2.8 (FA regulations). DEC received Alcoa's new instruments on March 31, 2017 (Letter of Credit) and May 17, 2017 (STA), and Arconic's on April 28, 2017 (Letter of Credit and STA). FA staff reviewed these instruments as they were submitted and found the wording to be acceptable per the FA regulations. FA staff followed up with Alcoa since the cost estimate had not been adjusted for inflation in 2017. In turn, the Letter of Credit was amended on May 18, 2017 to increase the face value for the adjusted amount.

(b) **General Electric (GE) Corporation:** FA staff completed an analysis of GE's submittals received in March 2016 (financial statements dated December 31, 2015) and March 2017 (financial statements dated December 31, 2016). The analysis was submitted to EPA-Region 2 on April 13, 2017. It indicated that there were several differences between these FT submittals, the most significant one being the list of New York facilities covered each year. 2016 had seven facilities listed whereas 2017 only had three listed. During subsequent communications with GE, FA staff learned that GE was including New York facilities on their FT that are not RCRA-C facilities and thus do not require FA.

After several months of discussions with GE's counsel regarding which GE facilities in New York require FA to be submitted, GE provided DEC with a Surety Bond (effective March 30, 2017, executed July 31, 2017) and STA (issued August 11, 2017) for corrective action at the Tonawanda facility and closure at the Niskayuna facility. An insurance policy was also issued for third party liability coverage of sudden and non-sudden accidental occurrences for these facilities, effective January 1, 2017. FA staff reviewed all draft instruments and addressed revisions prior to being signed, sealed and received on August 17, 2017.

4. **RCRA-C FA Training Program:** FA staff attended a FA training webinar which was hosted by EPA Region 6 office (Dallas, TX) on August 1-2, 2017. This was a comprehensive two-day training on FA for RCRA-C facilities and how to review all six types of FA instruments that are acceptable pursuant to the hazardous waste management regulations. Case studies were also completed and discussed accordingly. Industrial Economics



Incorporated (IEC) was the presenter and they did an excellent job providing an overview of each instrument and explaining the detailed case studies, along with addressing questions from both the live and online audiences. Matthew Loesel, EPA RCRA Training Coordinator, facilitated this training and addressed technical difficulties. He also read the questions submitted online so IEC could provide a response to each one. This question and answer (Q&A) segment was very helpful to FA staff, who suggested that a Q&A document be prepared and distributed to those who attended since there were many questions addressed during this 2-day training.

## **5. Transfer of RCRA-C Program**

Due to a reorganization between DEC's Division of Environmental Remediation (DER) and Division of Materials Management (DMM), as of February 1, 2018 the RCRA-C (hazardous waste) program has been transferred from DER to DMM. Efforts are underway for DER to provide DMM staff with training about RCRA-C FA which includes use of the FA module in RCRAInfo. DMM FA staff have already attended the March and April 2018 monthly FA conference calls and will continue to do so with DER FA staff. It is expected that this transition will be completed by September 1, 2018. In turn, DMM will be preparing future RCRA-C semi-annual and annual reports (which includes the status of FA) and submitting them to EPA.

## **III. Hazardous Waste Information**

### **A. Hazardous Waste Annual Reporting**

#### Status of Outputs to Date:

1. A total of 3,910 New York State Hazardous Waste Annual Reports for year 2016 were received on paper or electronically (through American Resource Management's EASITRAK on-line system) and were processed through a computerized system (eSMART). Potential large quantity generators, identified from manifest records, were notified of the reporting requirement. Discrepancies were resolved, including comparison with manifest data (see Section II.E above).
2. A public website was maintained to disseminate general information and for training purposes.

### **B. RCRAInfo Implementation**

#### Status of Outputs to Date:

1. Staff participated in the monthly RCRAInfo national data conference calls. NYSDEC has created a web page about EPA's launch of its new electronic manifesting system (e-Manifest) <http://www.dec.ny.gov/chemical/112876.html> NYSDEC has sent an introductory email announcing e-manifest to NY generators, receiving facilities and DEC staff.
2. QA/QC: Staff continued auditing data entry of enforcement data for SNCs/cases, in addition to inspection, violation and NOVs. DER staff ran data quality reports to monitor inspection, violation, enforcement, penalty, and payment (CME) information. Data corrections are made as necessary. The quality of the State's data in RCRAInfo is routinely evaluated and steps

are taken as necessary to maintain and improve that information. Staff regularly run and distribute custom reports of SNCs with open violations, SVs with open violations and inspections with undetermined violations.

3. Staff assisted regional inspectors in getting NYN EPA ID Nos. for CESQGs/non-generators they inspected, to enter them into RCRAInfo.

### Issues

1. The completion of programming the new CME module in V6 has been delayed by EPA. In November 2017, the existing V5 CME module software, which is used by NY to enter all our CME data, began working incorrectly. It is buggy when adding new violation citations, or linking to them.
2. EPA R2 has not updated RCRAInfo to make violation determinations for 388 sites in NY. This makes site regulatory compliance history determinations difficult for NYSDEC.
3. NYSDEC submitted comments to EPA ORCR regarding EPA's e-manifest download web service to be built for states, which included suggestions for what the service should include. NYSDEC currently collects manifest data in our internal db called eSmart, and will need this new web service to continue our manifest program. NYSDEC's inspection targeting, enforcement and billing all make use of manifest data.
4. NYSDEC has not received guidance on EPA's new e-manifest software in how the transporter and designated receiving facility drop-down lists will be populated. It may take some time to reach out to NY transporters and receiving facilities with any requirements newly implemented in e-manifest.
5. EPA R2's public web page about how the public may apply for, obtain and update, and how EPA R2 staff assign RCRA EPA Identification (ID) Numbers has been removed and not replaced. The MOA between NYSDEC and EPA R2 states it is EPA 's responsibility to assign IDs. The help web page should be recreated ASAP so that regulated businesses in NY are able to more easily submit the Notification of RCRA Subtitle C Activity form, which the HW regulations require, in order to obtain an ID.

## **IV. Effective Administration of the Hazardous Waste Grant**

### Status of Outputs to Date:

1. On January 19, 2018, DEC applied for the annual award for the period April 1, 2018 to March 31, 2019. The amount requested was based on EPA available funding. Federal funding was requested in the amount of \$5,990,420. The State match is \$1,996,807, which is 25 percent of the total budget of \$7,987,227. The matching share will be provided by time and activity of staff funded by the State. The Final Federal Financial Reports (FFR) will be submitted within the 90-day requirement. These federal funds support approximately 34 full-time equivalent (FTE) positions.
2. DER staff have attended meetings, conference calls and responded to email correspondence and phone calls to clarify the status of projects, reporting requirements, and other programmatic concerns.

## **ATTACHMENTS**

Attachment 1 – RCRA Permit-Order Projects

Attachment 2 – RCRA Groundwater Inspection Reporting

Attachment 3 – RCRA Corrective Action Remedial Project Tracking

Attachment 4 –RCRA Site-wide Reporting

Attachment 5 – Operating, Post-Closure and Corrective Action Permit Universe



**New York State - Department of Environmental Conservation**  
**Division of Environmental Remediation**  
**RCRA Permit/Order**

**Fiscal Year: 2017/2018** all months

ATTACHMENT 1

Both GPRA and non-GPRA Office Section ALL Bureau ALL

**Completeness Review (OP087)**

Site Code	SiteName	RCRA ID No.	BUR	End Date	Status
152009	Brookhaven National Laboratory	NY7890008975	BURE	05/25/2017	ACT
932014	FMC Corporation	NYD002126845	BURE	08/14/2017	ACT

**Public Notice (OP160)**

Site Code	SiteName	RCRA ID No.	BUR	Start Date	Status
152009	Brookhaven National Laboratory	NY7890008975	BURE	06/21/2017	ACT
932014	FMC Corporation	NYD002126845	BURB	08/18/2017	ACT

**Hearing (OP170)**

Site Code	SiteName	RCRA ID No.	BUR	End Date	Status
932014	FMC Corporation	NYD002126845	BURB	09/27/2017	ACT

**Issuance/Denial Permit OP200 pc200**

Site Code	SiteName	RCRA ID No.	BUR	End Date	Status
152009	Brookhaven National Laboratory	NY7890008975	BURE	09/07/2017	ACT
336053	Revere Smelting and Refining	NYD030485288	BURE	06/30/2017	ACT

**Orders / in lieu of PC Permits pc300**

Site Code	Document	SiteName	RCRA ID No.	GPRA	Doc ID	Eff. Date	RCRA Phase	Scope
442038	Order	Ashland Distributio	NYD046877775	Y	397	04/08/2017	Corrective Action	SWMU

## RCRA Groundwater Inspection Reporting

State Fiscal Year: 2017/2018

GPRA/Non-GPRA: Both (GPRA and Non-GPRA)

Report Period: 4/1 - 3/31

### RCRA - CME

Site No.	Site Name	RCRA ID No.	Bureau	Project Manager	GPRA	Project Name	End Date	End Status
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**Non-GPRA Count: 0**

Planned: 0

Actual: 0

**GPRA Count: 0**

Planned: 0

Actual: 0

**Total - RCRA - GME 0**

Planned: 0

Actual: 0

### RCRA - O MI

Site No.	Site Name	RCRA ID No.	Bureau	Project Manager	GPRA	Project Name	End Date	End Status
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#### GPRA

932046	CECOS	NYD080336241	BURE	JOHNSON K.	Y	RCRA GWI OMI	2/14/18	ACT
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**Non-GPRA Count: 0**

Planned: 0

Actual: 0

**GPRA Count: 1**

Planned: 0

Actual: 1

**Total - RCRA - O&M: 1**

Planned: 0

Actual: 1

## RCRA Corrective Action Remedial Project Tracking Report

ATTACHMENT 3

Fiscal Year Project Ends: 2017/2018

Report Period: 4/1 - 3/31

GPRA/Non-GPRA: Both (GPRA and Non-GPRA)

End Status: Actual

### Site Characterization

CA 050 RFA Completed

Site No.	Site Name	RCRA ID No.	OU	Description	End Date	Status	Enforcement Document	Eff. Date	Exp. Date	Project Manager	Bureau
<b><u>NON-GPRA</u></b>											
152236	Lawrence Ripak Co Inc	NYD064730294	01	Remedial Program	9/8/17	ACT				R. Mustico	BURA
907019	D.C. (Dow Craft) Rollforms	NYD002123727	01	REMEDIATION PROGRAM	6/30/17	ACT				D. Szymanski	BURE
<b><u>GPRA</u></b>											
558022	Norton Company - Sealants	NYD052980893	01	Remedial Program - RCRA Corrective Action	4/6/17	ACT				R. Mustico	BURA
623008	Fort Drum - Waste Disposal Areas	NY0214020281	03	Perfluorinated Compounds	8/31/17	ACT	Order CA	2/22/14		H. Bishop	BURA
<div><div>Non-GPRA Count:</div><div>2</div></div>											
<div><div>Planned:</div><div>0</div></div>											
<div><div>Actual:</div><div>2</div></div>											
<div><div>GPRA Count:</div><div>2</div></div>											
<div><div>Planned:</div><div>0</div></div>											
<div><div>Actual:</div><div>2</div></div>											
<div><div>Total - Site Characterization</div><div>4</div></div>											
<div><div>Planned:</div><div>0</div></div>											
<div><div>Actual:</div><div>4</div></div>											

### Remedial Investigation

CA 400 Remedy Decision - \*See Note Below

Site No.	Site Name	RCRA ID No.	OU	Description	End Date	Status	Enforcement Document	Eff. Date	Exp. Date	Project Manager	Bureau
<b><u>GPRA</u></b>											
336053	Revere Smelting and Refining	NYD030485288	04	RCRA Facility	6/22/17	ACT	Permit OP	7/31/17	7/30/27	B. Bennett	BURC
401003	Al Tech Specialty Steel	NYD060545209	02	REMEDIATION PROGRAM - 12 acre LANDFILL and	3/29/18	ACT	Order CA	2/4/00		I. Beilby	BURB
401003	Al Tech Specialty Steel	NYD060545209	03	ON-SITE STRUCTURES	3/29/18	ACT	Order CA	2/4/00		I. Beilby	BURB
401006	N.L. Industries	NYD002084721	03	Vicinity Properties	9/20/17	ACT				J. Abunaw	BURA

\*For this report - CA 400 and CA 550 are NOT sitewide. Sitewide accomplishments are reported from RCRA Details.

## RCRA Corrective Action Remedial Project Tracking Report

Fiscal Year Project Ends: 2017/2018						GPRA/Non-GPRA: Both (GPRA and Non-GPRA)					
Report Period: 4/1 - 3/31						End Status: Actual					
401062	Kendall Polken Nashua Tape	NYD066829599	01	Remedial Program	5/25/17	ACT	Order CA	6/4/02		A. Barraza	BURB
704014	Former IBM Endicott Facility	NYD002233039	07	NORTHWEST AREA	3/30/18	ACT	Order CA	8/14/04		J. Laclair	BURD
850003	G.T.E. Products Corporation	NYD002246015	01	Onsite RCRA CA	3/31/18	ACT				C. Magee	BURE
<hr/>											
Non-GPRA Count:		0									
Planned:		0									
Actual:		0									
GPRA Count:		7									
Planned:		0									
Actual:		7									
Total - Remedial Investigation		7									
Planned:		0									
Actual:		7									

### Remedial Design

CA 450 Design Approved

Site No.	Site Name	RCRA ID No.	OU	Description	End Date	Status	Enforcement Document	Eff. Date	Exp. Date	Project Manager	Bureau
<b><u>NON-GPRA</u></b>											
130004	RUCO Polymer Corp. (Hooker Chem)	NYD002920312	05	Offsite Soil Vapor	1/25/18	ACT				S. Scharf	BURA
734057	General Motors - Fisher Guide	NYD002239440	02	Upper Ley Creek and other off-facility areas (wetlds,	6/9/17	ACT				J. Luo	BURD
837009	Diaz Chemical Corporation	NYD067532580	03	Remedial Investigation - RI/FS	7/31/17	ACT	Order CA	7/30/94		M. Cruden	BURE
<b><u>GPRA</u></b>											
447001	Schenectady International	NYD002070118	02	WEST SIDE REMEDIAL PROGRAM	4/28/17	ACT	Permit OP	8/9/12	9/4/17	K. Sarnowicz	BURB
558013	G.E. Hudson Falls Plant Site	NYD002080075	2A	Remedial Program - Overburden Soils	12/20/17	ACT				K. Farrar	BURD
915009	Bethlehem Steel	NYD002134880	04	Coke Oven Area (Groundwater)	1/16/18	ACT	Order CA	5/10/10		S. Radon	BURE
932014	FMC Corporation	NYD002126845	02	AIR DEP. AREA 1 (Off-Site)	4/28/17	ACT	Order PC	6/18/91		N. Freeman	BURB
932014	FMC Corporation	NYD002126845	02	AIR DEP. AREA 1 (Off-Site)	10/31/17	ACT	Order PC	6/18/91		N. Freeman	BURB

## RCRA Corrective Action Remedial Project Tracking Report

Fiscal Year Project Ends: 2017/2018

Report Period: 4/1 - 3/31

GPRA/Non-GPRA: Both (GPRA and Non-GPRA)

End Status: Actual

Non-GPRA Count:	3
Planned:	0
Actual:	3
GPRA Count:	5
Planned:	0
Actual:	5
Total - Remedial Design	8
Planned:	0
Actual:	8

### IRM Remedial Design

CA 610 ICM Design Approval

Site No.	Site Name	RCRA ID No.	OU	Description	End Date	Status	Enforcement Document	Eff. Date	Exp. Date	Project Manager	Bureau
<b>GPRA</b>											
401003	AI Tech Specialty Steel	NYD060545209	01G	Removal & disposal of PCB contaminated soils/sed in	6/28/17	ACT	Order CA	2/4/00		I. Beilby	BURB
447017	Knolls Atomic Power Laboratory (KAPL)	NY6890008992	02C	Hillside G1/D4 Alleyway	4/28/17	ACT	Permit OP	7/30/12	7/29/22	L. Winterberger	BURB
Non-GPRA Count: 0											
Planned: 0											
Actual: 0											
GPRA Count: 2											
Planned: 0											
Actual: 2											
Total - IRM Remedial Design 2											
Planned: 0											
Actual: 2											

### Remedial Action

CA 550 CMI Construction Complete - \*See Note Below

Site No.	Site Name	RCRA ID No.	OU	Description	End Date	Status	Enforcement Document	Eff. Date	Exp. Date	Project Manager	Bureau
<b>NON-GPRA</b>											
152158	Precision Concepts, Inc.	NYD030282537	01	On-Site	2/5/18	ACT				H. Bishop	BURA

### GPRA

\*For this report - CA 400 and CA 550 are NOT sitewide. Sitewide accomplishments are reported from RCRA Details.

## RCRA Corrective Action Remedial Project Tracking Report

Fiscal Year Project Ends: 2017/2018			GPRA/Non-GPRA: Both (GPRA and Non-GPRA)							
Report Period: 4/1 - 3/31			End Status: Actual							
447007	Schenectady International -10th St Plant	NYD002070100	02	Remedial Program - SOIL CLEANUP	3/9/18	ACT	Order CA	12/5/91	K. Sarnowicz	BURB
558013	G.E. Hudson Falls Plant Site	NYD002080075	2A	Remedial Program - Overburden Soils	3/30/18	ACT			K. Farrar	BURD
850001A	Evans Chemetics -Div. of Hampshire Chem.	NYD002234763	03	former Village of Waterloo Landfill - SWMU 1	10/27/17	ACT	Order CA	8/12/11	G. Dieter	BURE
<b>Non-GPRA Count:</b>			<b>1</b>							
Planned:			0							
Actual:			1							
<b>GPRA Count:</b>			<b>3</b>							
Planned:			0							
Actual:			3							
<b>Total - Remedial Action</b>			<b>4</b>							
Planned:			0							
Actual:			4							

### IRM Remedial Action

CA 650 ICM Construction Complete

Site No.	Site Name	RCRA ID No.	OU	Description	End Date	Status	Enforcement Document	Eff. Date	Exp. Date	Project Manager	Bureau
<b><u>NON-GPRA</u></b>											
734057	General Motors - Fisher Guide	NYD002239440	01X	Vapor Intrusion Mitigation IRM- Phase 1	6/19/17	ACT				J. Luo	BURD
<b><u>GPRA</u></b>											
447017	Knolls Atomic Power Laboratory (KAPL)	NY6890008992	02B	Former High Yard Area	12/19/17	ACT	Permit OP	7/30/12	7/29/22	L. Winterberger	BURB
850001A	Evans Chemetics -Div. of Hampshire Chem.	NYD002234763	01C	Building 4 Area - AOC B	3/21/18	ACT	Order CA	8/12/11		G. Dieter	BURE
850001A	Evans Chemetics -Div. of Hampshire Chem.	NYD002234763	01D	Monitoring Well MW-11S Area - AOC D	3/21/18	ACT	Order CA	8/12/11		G. Dieter	BURE
932106	914 Tactical Airlift Group	NY0570024273	01A	Site #3 - Landfill	7/13/17	ACT	Order CA	8/22/16		S. Radon	BURE
932106	914 Tactical Airlift Group	NY0570024273	01B	Site #5 - BOMARC	7/13/17	ACT	Order CA	8/22/16		S. Radon	BURE
932106	914 Tactical Airlift Group	NY0570024273	01C	Site #7 - JP-4 Spill	7/13/17	ACT	Order CA	8/22/16		S. Radon	BURE
932106	914 Tactical Airlift Group	NY0570024273	01D	Site #8 - Drum Storage	7/13/17	ACT	Order CA	8/22/16		S. Radon	BURE

## RCRA Corrective Action Remedial Project Tracking Report

Fiscal Year Project Ends: 2017/2018					GPRA/Non-GPRA: Both (GPRA and Non-GPRA)						
Report Period:		4/1 - 3/31			End Status: Actual						
932106	914 Tactical Airlift Group	NY0570024273	01E	Site #10 - Fire Training Area	7/13/17	ACT	Order	CA	8/22/16	S. Radon	BURE
932106	914 Tactical Airlift Group	NY0570024273	01F	Site #13 - UST	7/13/17	ACT	Order	CA	8/22/16	S. Radon	BURE
<hr/>											
Non-GPRA Count:		1									
Planned:		0									
Actual:		1									
GPRA Count:		9									
Planned:		0									
Actual:		9									
Total - IRM Remedial Action		10									
Planned:		0									
Actual:		10									

### Periodic Review

CA 577 CMI Effectiveness Evaluation - \*See Note Below

Site No.	Site Name	RCRA ID No.	OU	Description	End Date	Status	Enforcement Document	Eff. Date	Exp. Date	Project Manager	Bureau
<b><u>NON-GPRA</u></b>											
808001	Purolator Products Co. (formerly Facet)	NYD073675514	00	Site Management	9/26/17	ACT				A. Morgan	BURE
907019	D.C. (Dow Craft) Rollforms	NYD002123727	00	Site Management	9/20/17	ACT				D. Szymanski	BURE
932021	Hooker-Hyde Park Landfill	NYD000831644	00	Site Management	7/17/17	ACT				B. Sadowski	BURE
932035	GrafTech International Holdings Inc.	NYD002106920	00	Site Management	4/5/17	ACT				G. May	BURE
932035	GrafTech International Holdings Inc.	NYD002106920	00	Site Management	2/7/18	ACT				G. May	BURE
<b><u>GPRA</u></b>											
152031	Peerless Photo Products	NYD002044139	00	Site Management	8/22/17	ACT				G. Desai	BURA
152154	Safety-Kleen Corp. - North Amityville	NYD000708198	00	Environmental Monitoring Program	3/30/18	ACT				K. Johnson	
356002	IBM - Kingston	NYD001359694	00	Site Management	5/18/17	ACT	Order PC	7/8/11		W. Mizerak	BURC
356009	Rotron - Woodstock	NYD001223692	00	Site Management	5/19/17	ACT				B. Bennett	BURC
356025	Channel Master	NYD042457788	00	Create on 03252013	9/18/17	ACT	Permit PC	4/1/91	3/31/96	J. Spellman	BURC

**New York State - Department of Environmental Conservation  
Division of Environmental Remediation**

4/17/2018

**RCRA Corrective Action Remedial Project Tracking Report**

<b>Fiscal Year Project Ends: 2017/2018</b>			<b>GPRA/Non-GPRA: Both (GPRA and Non-GPRA)</b>									
<b>Report Period: 4/1 - 3/31</b>			<b>End Status: Actual</b>									
401002	General Electric (Noryl Avenue)	NYD066832023	00	Site Management	9/13/17	ACT	Order PC	11/29/12		R. Curley	BURB	
401034A	Watervliet Arsenal - Main Manufacturing	NY7213820940	00	Site Management	3/15/18	ACT	Order CA	10/12/93		A. Barraza	BURB	
413013	Boiler Room Area (Amphenol)	NYD001827633	00	Site Management	5/30/17	ACT				J. Strang	BURB	
442038	Ashland Distribution	NYD046877775	00	site management	4/30/17	ACT	Order CA	4/8/17		M. Maccabe	BURB	
546003	General Electric - Waterford	NYD002080034	00	Site-wide Groundwater Monitoring	6/23/17	ACT	Permit OP	3/1/16	2/28/21	S. Malsan	BURA	
709001	Borden Chemical	NYD000691865	00	Site Management	12/14/17	ACT	Order CA	11/21/90		K. Keenan	BURE	
734010	Stauffer Mgt. - Skaneateles Falls	NYD004859955	00	Site Management	8/11/17	ACT	Order CA	3/28/91		J. Grathwol	BURB	
734013	Quanta Resources	NYD980592448	00	Site Management	7/13/17	ACT				C. Mannes	BURD	
734020	McKesson Envirosystems (Inland Site)	NYD075806836	00	Site Management	12/28/17	ACT				P. Long	BURE	
734064	Roth Brothers	NYD006977086	00	Site Management	1/19/18	ACT				E. Hausamann	BURD	
734065	Martin Marietta - Electronics Park	NYD059385120	00	Site Management - Groundwater Recovery and	8/10/17	ACT	Order CA	12/26/97		J. Laclair	BURD	
734067	Safety-Kleen Corp. - Syracuse	NYD000824581	00	Site Management	1/11/18	ACT	Order CA	6/4/90		K. Johnson	BURE	
754012	Tioga Casting Facilities	NYD002245819	00	Entire Site	6/20/17	ACT	Order CA	8/14/89		P. Long	BURE	
828079	Stuart-Olver-Holtz	NYD002215341	00	Site Management	11/2/17	ACT				G. Momberger	BURE	
828095	Rochester Gas & Electric - Brooks Ave.	NYD000818781	00	Create on 03252013	6/1/17	ACT	Permit CA	9/23/15	9/22/25	G. Dieter	BURE	
828177	Eastman Kodak Co.- Eastman Business Park	NYD980592497	00	Site Management	5/19/17	ACT	Permit OP	1/26/15	1/25/20	C. Gregory	BURE	
915009	Bethlehem Steel	NYD002134880	00	Site Management	8/3/17	ACT	Order CA	5/10/10		S. Radon	BURE	
915144	Niagara Mohawk Dewey Ave. Service Sta.	NYD000730390	00	Site Management	12/1/17	ACT	Order CA	11/12/97	11/12/27	D. Szymanski	BURE	
915146	Niagara Transformer - Dale Road	NYD002106177	00	Site Management	8/17/17	ACT				D. Szymanski	BURE	
915244	General Electric Buffalo Service Shop	NYD067539940	00	Site Management	6/5/17	ACT	Permit CA	7/5/12	7/4/22	J. Laclair	BURD	
932019	Former Hooker Main Plant	NYD000824482	00	SITE MANAGEMENT	5/11/17	ACT	Permit CA	9/29/08	9/28/18	B. Mcpherson	BURE	

*\*For this report - CA 577 and CA 677 are ALWAYS sitewide.*



## RCRA Corrective Action Remedial Project Tracking Report

Fiscal Year Project Ends: 2017/2018				GPRA/Non-GPRA: Both (GPRA and Non-GPRA)							
Report Period: 4/1 - 3/31				End Status: Actual							
932040	Occidental Durez Engineered Materials	NYD002103216	00	Site Management	6/20/17	ACT	Permit OP	3/21/13	3/20/13	J. Trad	BURE
932043	Frontier Chemical - Pendleton	NYD991292053	00	Site Management	11/15/17	ACT				B. Sadowski	BURE
932045	CWM Chemical Services, LLC	NYD049836679	00	Routine Environmental Monitoring Program	3/14/18	ACT	Permit OP	8/21/13	8/20/18	K. Johnson	
932046	CECOS	NYD080336241	00	Routine Post-Closure and Corrective Action Monitoring	3/14/18	ACT	Permit PC	10/25/16	10/24/26	K. Johnson	
932096	Solvent Chemical	NYD000824466	00	Site Management	6/8/17	ACT	Order CA	10/8/97		M. McIntosh	BURE
932106	914 Tactical Airlift Group	NY0570024273	00	Site Management	4/12/17	ACT	Order CA	8/22/16		S. Radon	BURE
932110	Frontier Chemical - Royal Avenue	NYD043815703	00	Site Management	12/19/17	ACT				B. Sadowski	BURE
961009	Prestolite Plant Site	NYD001931120	00	Site Management	8/29/17	ACT				D. Szymanski	BURE
<b>Non-GPRA Count:</b>				<b>5</b>							
Planned:				0							
Actual:				5							
<b>GPRA Count:</b>				<b>34</b>							
Planned:				0							
Actual:				34							
<b>Total - Periodic Review</b>				<b>39</b>							
Planned:				0							
Actual:				39							

### IRM Interim Site Management

CA 677 ICM Effectiveness Evaluation - See Note Below

Site No.	Site Name	RCRA ID No.	OU	Description	End Date	Status	Enforcement Document	Eff. Date	Exp. Date	Project Manager	Bureau
<b><u>GPRA</u></b>											
447007	Schenectady International -10th St Plant	NYD002070100	01A	Remedial Program - IRM Bailing LNAPL out of Wells	4/19/17	ACT	Order CA	12/5/91		K. Sarnowicz	BURB

## RCRA Corrective Action Remedial Project Tracking Report

Fiscal Year Project Ends: 2017/2018

GPRA/Non-GPRA: Both (GPRA and Non-GPRA)

Report Period: 4/1 - 3/31

End Status: Actual

Non-GPRA Count:	0
Planned:	0
Actual:	0
GPRA Count:	1
Planned:	0
Actual:	1
Total - IRM Interim Site Management	1
Planned:	0
Actual:	1

**New York State - Department of Environmental Conservation  
Division of Environmental Remediation  
RCRA Sitewide Reporting**

**Fiscal Year: 2017/2018**

all months

CA400,CA550,CA725,CA750,CA900,CA999,RAU

ATTACHMENT 4

**CA 400 Sitewide Remedy Selection**

Site Code	SiteName	RCRA ID No.	BUR	GPRA	Date	Status
152005	Hazeltine Corporation	NYD002041242	BURA	Y	07/28/2017	Actual
152236	Lawrence Ripak Co Inc	NYD064730294	BURA	N	09/15/2017	Actual
401062	Kendall Polken Nashua Tap	NYD066829599	BURB	Y	05/25/2017	Actual
850003	G.T.E. Products Corporati	NYD002246015	BURE	Y	03/30/2018	Actual
915249	Century Centre I	NYD002107399	BURE	N	07/24/2017	Actual

**CA 550 Sitewide Construction**

Site Code	SiteName	RCRA ID No.	<u>BUR</u>	GPRA	Date	Status
152158	Precision Concepts, Inc.	NYD030282537	BURA	N	03/31/2018	Actual
152236	Lawrence Ripak Co Inc	NYD064730294	BURA	N	09/15/2017	Actual
447007	Schenectady International	NYD002070100	BURB	Y	09/26/2017	Actual
828166	University of Rochester	NYD000631994	BURE	N	09/11/2017	Actual

**CA 725 Human Exposures Controlled**

Site Code	SiteName	RCRA ID No.	<u>BUR</u>	GPRA	Date	Status
152158	Precision Concepts, Inc.	NYD030282537	BURA	N	03/31/2018	Actual
152236	Lawrence Ripak Co Inc	NYD064730294	BURA	N	09/15/2017	Actual
828167	Dupont E I De Nemours & C	NYD000632125	BURE	N	03/05/2018	Actual
915150	ENRX, Inc. (formerly Voel	NYD991291782	BURE	Y	08/31/2017	Actual

**CA 750 Groundwater Mitigation Controlled**

Site Code	SiteName	RCRA ID No.	<u>BUR</u>	GPRA	Date	Status
152236	Lawrence Ripak Co Inc	NYD064730294	BURA	N	09/15/2017	Actual
344072	Avery Dennison - Informat	NYD056303266	BURC	N	09/22/2017	Actual
808007	Westinghouse Electric Cor	NYD079678108	BURE	N	09/28/2017	Actual
828167	Dupont E I De Nemours & C	NYD000632125	BURE	N	03/05/2018	Actual

**CA 900 Performance Standard Attained**

Site Code	SiteName	RCRA ID No.	<u>BUR</u>	GPRA	Date	Status
152005	Hazeltine Corporation	NYD002041242	BURA	Y	07/28/2017	Actual
152158	Precision Concepts, Inc.	NYD030282537	BURA	N	12/07/2017	Actual
828166	University of Rochester	NYD000631994	BURE	N	09/21/2017	Actual
932019	Former Hooker Main Plant	NYD000824482	BURE	Y	11/27/2017	Actual
932052	Bell Aerospace - Textron	NYD002106276	BURE	Y	02/09/2018	Actual

**CA 999 CA Process Completed**

Site Code	SiteName	RCRA ID No.	<u>BUR</u>	GPRA	Date	Status
152158	Precision Concepts, Inc.	NYD030282537	BURA	N	02/05/2018	Actual
152236	Lawrence Ripak Co Inc	NYD064730294	BURA	N	09/15/2017	Actual

**New York State - Department of Environmental Conservation  
Division of Environmental Remediation  
RCRA Sitewide Reporting**

**Fiscal Year:** 2017/2018  
all months

CA400,CA550,CA725,CA750,CA900,CA999,RAU

**CA 800 RAU Ready for Anticipated Use**

Site Code	SiteName	RCRA ID No.	<u>BUR</u>	GPRA	Date	Status
152158	Precision Concepts, Inc.	NYD030282537	BURA	N	03/31/2018	Actual
152236	Lawrence Ripak Co Inc	NYD064730294	BURA	N	09/15/2017	Actual
734125	Niagara Grid Seven North	NYD000730382	BURD	Y	11/01/2017	Actual
828166	University of Rochester	NYD000631994	BURE	N	09/19/2017	Actual
915002	Allied Chemical, R & D Fa	NYD000632315	BURE	Y	09/22/2017	Actual

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## Attachment 5 - Operating, Post Closure and Corrective Action Permit Universe

CORRECTIVE ACTION ONLY							
Site No	Site Name	RCRA ID	Permit Expires	Enf Doc	Expected Issue	Issued	CA Complete
1 130003	Grumman Aerospace-Bethpage Fac.	NYD002047967	8/2/2012	Convert to Order	9/30/2018		No
2 152015	Chemical Pollution Control	NYD082785429	6/21/2015	Convert to Order	7/31/2018		SM order expected
3 152136	Us Navy, Nwlrp Calverton	NYD003995198	8/2/2022	Permit	12/31/2022		No
4 152154	Safety-Kleen Corp. – N. Amityville	NYD000708198		Convert to Order	12/31/2018		No
5 241018	Safety-Kleen Corp. – Woodside	NYD980785760	N/A	N/A	N/A	CA999-2/7/2013	Yes
6 314004	Texaco Research	NYD091894899	N/A	Convert to Order	N/A	10/31/2013	No
7 314054	Ibm Corporation - East Fishkill	NYD000707901	11/1/2021	Permit	12/31/2022		Yes
8 336006	Nepera Inc. – Harriman	NYD002014595	N/A	Order	N/A	5/29/2014	No
9 336028	Majestic Weaving Corporation	NYD001701382	N/A	Order	N/A	1/18/2012	Yes
10 344003	Wyeth Pharmaceuticals	NYD054065909	9/29/1998	Order	N/A	7/21/2015	Yes - Corrective Action Order
11 356001	Hercules Inc. (DynoNobel)	NYD000799122	9/22/2005	Convert to Order	6/30/2018		Yes - needs order?
12 356025	Channel Master (Avnet)	NYD042457788	3/31/1996	Convert to Order		2/6/2018	No, also PC
13 442038	Ashland Distribution	NYD046877775	N/A	Order	N/A	3/29/2017	No, 3008 (h) order
14 447001	Schenectady International	NYD002070118	9/4/2017	Permit	12/31/2017		No
15 447004	G.E. Main Plant	NYD002084135	N/A	RD/RA Order	N/A	11/9/2006	No, orders in eDocs
16 447005	G.E. Riverview Plant	NYD052987096	N/A	RD/RA Order	N/A	12/16/2013	No
17 447011	Usdoe - Separations Proc Res Unit	NYR000096859	9/28/2018	Permit	12/31/2018		No
18 510018	Wyeth Pharmaceuticals Inc	NYD002081396	3/3/2019	Permit	12/31/2019		Yes
19 558004	G.E. Fort Edward Plant Site	NYD093256063	N/A	Order	N/A	multiple	No, orders in edocs
20 704025	Ashland Chemical	NYD049253719	N/A	Convert to Order	N/A	4/5/2013	No
21 734065	Martin Marietta - Electronics Park	NYD059385120	N/A	Order	N/A	12/26/1997	No, state order for CA
22 734125	Niagara Mohawk	NYD000730382	6/30/1999	Convert to Order	N/A	11/20/2015	No
23 738037	NIMO - 9 Mile Point #1 and #2	NYD000730432	N/A	N/A	N/A	CA999-2/27/2014	Yes
24 754006	Lockheed Martin (Former IBM)	NYD986874501	3/29/2020	Permit	9/30/2020		No
25 828003	Fmr G.E. and Black & Decker Site	NYD002221919	2/11/1999	RD/RA Order	10/31/2018		No, also PC
26 828064	Delphi Automotive Systems	NYD002215234	N/A	RD/RA Order	9/30/2018		No
27 828095	RG&E Brooks Ave.	NYD000818781	9/22/2025	Permit	N/A	9/23/2015	No
28 828099	Valeo Fmr GM - Delco Fac.	NYD002215226	N/A	RD/RA Order	N/A	10/3/2016	No
29 850003	GTE Products Corp. (Phillips)	NYD002246015	N/A	Order	12/31/2018		No
30 859029	R. E. Ginna Nuclear Power Plant	NYD000692376	N/A	N/A	N/A	CA999-2/27/2014	Yes
31 905005	Western NY Nuclear Serv Ctr.	NYD986905545	N/A	Order	12/31/2020		No, expect to update 1992 order
32 905039	US Dept. of Energy- West Valley	NYD980779540	N/A	Permit	12/31/2020		No, expect CA module in storage permit
33 915002	Honeywell Buffalo Research Lab	NYD000632315	N/A	Convert to Order	N/A	11/1/2012	No
34 915144	Niagara Mohawk Dewey Ave. Serv	NYD000730390	N/A	Order	N/A	11/12/1997	No
35 915244	GE Buffalo	NYD067539940	7/4/2022	Permit	1/4/2023		No
36 932019	Occidental Chemical Corporation	NYD000824482	9/28/2018	Permit	3/31/2019		No

37	932106	914 <sup>th</sup> Airlift Wing	NY0570024273	3/8/2015	Convert to Order	N/A	8/22/2016	No
38	932030B	Akzo Nobel Polymer Chemicals Llc	NYD043815158	8/9/2021	Permit	12/31/2021		No

#### POST CLOSURE

Site No	Site Name	RCRA ID	Permit Expires	Enf Doc	Expected Issue	Issued	PC Complete
39	413018	Amphenol Corp. Bendix Conn	NYD981133184	2/15/1996	Terminate Permit	N/A	Yes, permit was extinguished in 2015 with no need for an order going forward
40	314004	Chevron Texaco At Beacon	NYD091894899	N/A	Order	N/A	No
41	336008	Cornwall Properties, LLC	NYD001223338	8/18/1999	Convert to Order	N/A	No
42	356002	IBM - Kingston	NYD001359694	N/A	Order	N/A	No
43	356025	Channel Master (Avnet)	NYD042457788	3/31/1996	Convert to Order	2/6/2018	No
44	360044	Safety-Kleen Corp. - Thornwood	NYD000708172	11/11/2008	Convert to Order	12/31/2018	No
45	401002	Sabic Inovative Plastics Us, L	NYD066832023	N/A	Order	11/29/2012	No
46	546003	MPM Silicones, LLC	NYD002080034	1/12/2004	Permit	see Operating	PC module in operating permit
47	557004	Hercules/Ciba	NYD000818419	11/25/2014	Permit	10/31/2018	No
48	557011	BASF (Ciba Specialty Chem)	NYD002069748	3/5/2025	Permit	9/5/2025	No
49	633022	Industrial Oil Tank Site	NYD095577342	N/A	N/A	N/A	CA 999 5/2013
50	734064	Metalico Aluminium Recovery	NYD000697086	N/A	Convert to Order	N/A	DEC decided no permit or order
51	828003	Black & Decker (U.S), Inc.	NYD002221919	2/11/1999	TSDf Permit	10/31/2018	No
52	905004	Moench Tanning	NYD002126910	N/A	Convert to Order	9/30/2018	No
53	915009	Bethlehem Steel/Tecumsah	NYD002134880	N/A	Order	N/A	6/30/2009
54	915254	PVS Chemical Solutions	NYD980534390	N/A	Convert to Order	12/31/2017	No, CMS order in place will need order after ROD issued
55	932014	FMC Corporation	NYD002126845	N/A	Permit	3/31/2019	also 915004
56	932039	Van De Mark Chem Co., Ind. LF	NYD991290529	N/A	Convert to Order	N/A	permit call in letter 3/18/2015
57	932045	Cwm Chemical Services, Llc	NYD049836679	8/20/2018	TSDf Permit	see Operating	No
58	932046	CECOS International, Inc.	NYD080336241	11/3/2014	Permit	12/23/2026	PC module in operating permit

59	932052	Bell Aerospace Textron	NYD002106276	N/A	Convert to Order	N/A	1/26/2014	No
60	915012A	Buffalo Color Corp	NYD080335052	2/10/2000	Permit	N/A	N/A	No, either BCP agreements or orders in place

		<u>OPERATING</u>						
	Site No	Site Name	RCRA ID	Permit Expires	Enf Doc	Expected Issue	Issued	Closed
61	130078	Hicksville Operations Center	NYD006866008	6/19/2018	Permit	12/31/2018		No
62	152009	Brookhaven National Laboratory	NY7890008975	9/6/2027	Permit	12/31/2027		No
63	152015	Chemical Pollution Control	NYD082785429	6/21/2015	Permit	N/A		Closed 2015
64	241003	Triumvirate Environmental	NYD077444263	12/20/2022	Permit	12/31/2023		No
65	241012	Con Edison - Astoria	NYD980593636	7/7/2018	Permit	12/31/2018		No
66	314001	Ibm Corporation - Poughkeepsie	NYD080480734	11/15/2019	Permit	12/31/2020		No
67	336053	Revere Smelting And Refining Corp.	NYD030485288	7/30/2027	Permit	12/31/2027		No
68	356045	Central Hudson Gas And Electric	NYD000705905	8/31/2020	Permit	12/31/2020		No
69	360040	Ibm Thomas J Watson Research	NYD084006741	1/31/2023	Permit	12/31/2023		No
70	401041	Norlite Corporation	NYD080469935	12/31/2020	Permit	7/6/2021		No
71	401043	Safety-Kleen Systems - Cohoes	NYD986872869	3/9/2026	Permit	9/30/2026		No
72	447013	General Electric Global Research	NYD071094197	1/9/2022	Permit	12/31/2022		No
73	447017	U.S.D.O.E. KAPL-Knolls Site	NY6890008992	7/29/2022	Permit	12/31/2022		No
74	546003	Mpm Silicones, Llc	NYD002080034	2/28/2021	Permit	8/31/2021		No
75	546038	U.S.D.O.E. KAPL-Kesselring Site	NY5890008993	12/12/2023	Permit	12/31/2024		No
76	704025	Nexio Solutions	NYD049253719	5/29/2023	Permit	12/31/2023		No
77	734061	Safety-Kleen Systems Dewitt	NYD982743312	9/13/2022	Permit	12/31/2023		No
78	734063	Solvents And Petroleum Service	NYD013277454	3/4/2023	Permit	12/31/2023		No
79	826006	Arkema Inc.	NYD002218436	1/15/2018	Permit	12/31/2018		No
80	826015	Safety-Kleen Systems -Avon	NYD980753784	4/22/2024	Permit	12/31/2024		No
81	828177	Eastman Kodak Company	NYD980592497	1/25/2020	Permit	7/25/2020		No
82	828178	Xerox Corporation	NYD002211324	5/30/2022	Permit	12/31/2022		No
83	915161	Safety-Kleen Systems Inc	NYD981556541	3/28/2023	Permit	12/31/2023		No
84	932040	Durez Corporation	NYD002103216	3/20/2018	Permit	12/31/2018		No
85	932045	Cwm Chemical Services, Llc	NYD049836679	8/20/2018	Permit	9/30/2019		No
86	932045	CWM - Permit Mod for RMU#2	NYD049836679		Modification	3/31/2020		No

	expected this FY
(date)	accomplished this FY